

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

RE:

PABLO JOEL CRUZ NARVAEZ

DEBTOR

CASE NO. 15-10229 ESL

CHAPTER 13

RE:

DENISE MARIE DELGADO VELAZQUEZ

DEBTOR

CASE NO. 15-10230 MCF

JOINT MOTION FOR ORDER OF SUBSTANTIVE CONSOLIDATION

THE HONORABLE COURT:

COMES NOW, ROBERTO FIGUEROA CARRASQUILLO, attorney for the debtors named above, who represents and prays as follows:

1. The bankruptcy petition in number 15-10229 ESL was filed on December 23, 2015 and in case 15-10230 MCF the petition was also filed on December 23, 2015.

2. These two cases are related in the debtors PABLO JOEL CRUZ NARVAEZ and DENISE MARIE DELGADO VELAZQUEZ are currently living together as common-law-spouses.

3. There are real and personal properties which are held in common ownership and which are scheduled in both cases. In addition, there are creditors who are parties in interest in both cases.

4. It is the best interest of the debtors, creditors and other parties in interest that the case be substantively consolidated so that they may be jointly administered in order to permit meetings, hearings and other events to be scheduled at the same time, and in order to file a consolidated plan, and to reduce administrative costs to all parties in interest, as

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JOINT MOTION FOR ORDER OF SUBSTANTIVE CONSOLIDATION

Pablo Joel Cruz Narvaez/15-10229 ESL13

Denise Marie Delgado Velazquez/15-10230 MCF13

well as to this Honorable Court.

WHEREFORE, movant prays for an order of substantive consolidation of these two cases encompassing such terms as this Honorable Court may deem proper.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I **CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtors in the above captioned cases, Pablo Joel Cruz Narvaez and Denise Marie Delgado Velazquez; and to all creditors and parties appearing in both master address lists, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 04th day of January, 2016.

/s/ Roberto Figueroa-Carrasquillo
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Label Matrix for local noticing
0104-3
Case 15-10229-ESL13
District of Puerto Rico
Old San Juan
Mon Jan 4 12:36:50 AST 2016

US Bankruptcy Court District of P.R.
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End of Label Matrix
Mailable recipients 14
Bypassed recipients 0
Total 14

Label Matrix for local noticing
0104-3
Case 15-10230-MCF13
District of Puerto Rico
Old San Juan
Mon Jan 4 12:37:19 AST 2016

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